

October 10, 2018

Sent via Electronic Mail and Overnight Courier

Director, Emergency and Remedial Response Division
Attn: Chief, New Jersey Remediation Branch, Pohatcong Site
United States Environmental Protection Agency Region 2
290 Broadway, 19th Floor
New York, New York 10007

New Jersey Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency Region 2
290 Broadway, 17th Floor
New York, New York 10007
Attention: Attorney for Pohatcong Site

New Jersey Department of Environmental Protection
ATTN.: Fred Mumford
380 Scotch Road
West Trenton, New Jersey 08628
(*via electronic mail only*)

Re: Monthly Progress Report No. 24
Reporting Period September 1, 2018 through September 30, 2018
Operable Unit 3
Pohatcong Valley Groundwater Contamination Superfund Site
Warren County, New Jersey

Dear Pohatcong Consent Decree Notice Recipients:

On behalf of Pechiney Plastics Packaging, Inc. (PPPI), the Primary Settling Defendant for the Remedial Design/Remedial Action Consent Decree (CD)¹, this monthly progress report is submitted in compliance with section X, paragraph 30 of the CD and section IV.A of the Statement of Work for Remedial Design and Remedial Action for Operable Unit 3 (OU3 SOW)² of the Pohatcong Valley Groundwater Contamination Superfund (PVGCS) Site. As required by

¹ In the matter of United States of America v. PPPI (Civil Action No. 09-cv-05692) and United States of America v. Bristol Myers Squibb Company, et. al. (Civil Action No. 13-cv-05798) effective March 11, 2015.

² Pursuant to Section VI. Paragraph 12.c(1) of the CD, USEPA approval of the OU3 SOW was received on June 26, 2017.

the OU3 SOW, this report provides a description of the actions and activities undertaken pursuant to the CD during this reporting period and plans, actions and data scheduled in the next eight weeks.

Actions Taken toward Compliance with Consent Decree, including Community Relations

The following activities were performed during this reporting period:

- Notification of resampling of POHMW49 planned for September 10, 2018 was provided to USEPA in email correspondence dated September 6, 2018.
- POHMW49 was resampled on September 10, 2018.
- Landscaping was performed on September 11, 2018 to restore the ground surface in the vicinity of newly installed monitoring well POHMW49.
- The Monthly Progress Report for OU3 for the August 2018 reporting period was submitted to the USEPA on September 10, 2018.
- Cleaning of the waste water poly tank used to contain liquids generated from PDI activities was performed on September 10, 2018. The tank was transported off-site on September 11, 2018.
- Preliminary results from the resampling of POHMW49 were provided in e-mail correspondence dated September 18, 2018.
- Approval to perform additional pre-design investigation (PDI) soil borings inside the Main Production Area during the scheduled plant shutdown in December was provided by USEPA in a telephone conversation on September 20, 2018.

Problems Encountered, Actions Taken and Their Resolutions

The following problems were encountered during this reporting period:

- None.

Analytical Results and Data Received During the Reporting Period

The following analytical data were received during this reporting period:

- The analytical laboratory report for the resampling of monitoring well POHMW-49 was received.

Modifications to the OU3 Work Plans or Schedules

The following modifications to Work Plans for OU3 or other schedules proposed to USEPA were submitted during this reporting period:

- None.

Anticipated Plans, Actions and Data Scheduled, including Community Relations (during the Next 8 weeks)

The following activities are planned for the next eight weeks:

- A Pilot/Treatability Study Evaluation (P/TSE) Report will be prepared and submitted to USEPA to summarize the results of the PDI activities and the SVE pilot study.
- A Preliminary (30%) Design Report, which will include a summary of the results of the PDI, will be prepared and submitted to USEPA.
- Installation and sampling of additional pre-design investigation (PDI) soil borings inside the Main Production Area is planned for the scheduled plant shutdown in December 2018.

Estimate of the Percentage of the Work Completed

The following provides a qualified estimate of the percentage of the Work required by the CD that has been completed through this reporting period:

- Approximately 10% of the work required under the OU3 SOW has been completed to date.

Delays Encountered or Anticipated, and Efforts Taken to Mitigate

The following delays were encountered during this reporting period:

- None.

Closing

Pursuant to section X, paragraph.30 of the CD, three hard copies of this monthly progress report have been submitted to the designated recipients. If you have any questions or comments regarding this monthly progress report, please feel free to contact me.

Sincerely,

Luis Hidalgo
Project Coordinator

cc: *via electronic mail*
Michelle Grainger – USEPA, Region 2
Jeff Armington – Rio Tinto
Bruce White – Barnes & Thornburg LLP
Bruce Kennington – Ramboll